



E&A CONSULTING GROUP, INC.  
ENGINEERING • PLANNING • FIELD SERVICES

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February 23, 2012

Dedriel Newsome  
U.S. Environmental Protection Agency, Region VII  
901 N. 5<sup>th</sup> St  
Kansas City, KS 66101

received  
2/23/2012

RE: Notice of Violation  
U-Pick-It  
7700 E. Winner Rd  
Kansas City, MO 64125

AWMD / WEMM

MAR 20 2012

RECEIVED

E&A # P2012.085.001

Dear Ms. Newsome

E&A Consulting Group, Inc. was recently hired by Adam Moran, General Manager of U-Pick-It Kansas City, Missouri and Bill Baber, Safety Coordinator to assist in responding to the February 8-9 Notice of Violation letter. I have met with Mr. Moran and Mr. Baber to discuss the contents of the NOV and also conducted a site inspection of the facility. Mr. Moran and Mr. Baber have expressed their desire to make best efforts towards bringing their facility into compliance and in fact, have made significant progress regarding several of the noted deficiencies. This letter is on behalf of the facility representative Adam Moran, U-Pick-It, Inc.'s General Manager. Mr. Moran can be reached by telephone at 913-207-7879 or by email at [HUSKERFAN8982@YAHOO.COM](mailto:HUSKERFAN8982@YAHOO.COM). If Mr. Moran is unavailable Mr. Tordoff, Assistant General Manager can serve as the facility contact. Please let this letter serve as Mr. Moran's 14 day written response as noted in the NOV.

Specifically, the following responses are offered regarding the items contained in the NOV:

**1. Used oil being disposed in the environment and not being cleaned up.**

U-Pick-It, Inc. has contacted Jorge Gonzalez (816-796-9660) with Safety-Kleen to aid in the disposal of oil stained absorbent material and oil stained soil. Totes are being brought to the facility for disposing of oil stained absorbent material and for disposing of oil stained soil. Starting as soon as possible, weather permitting; U-Pick-It, Inc. will start removing dirt in sections of the vehicle storage areas that are oil stained. This process

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RCRA

should be completed within 2-3 months, worst case scenario. Oil soaked floor dry, near the fluid recovery racks and around fluid storage areas, will start to be removed by the end of the week 2/24/12. U-Pick-It, Inc. estimates that the total volume of oil stained soil and absorbent material needing to be removed will be less than 5 cubic yards. If during the process it becomes evident that more than five cubic yards of oil stained soil and absorbent material is being removed they will follow the Missouri Department of Natural Resources, Used Oil Cleanup Checklist, PUB002115. See attachments for a copy of the Used Oil Cleanup Checklist. U-Pick-It, Inc. will provide receipts/reports for disposal as they become available.

Once the cleaning process is complete Safety-Kleen will continue to be employed to dispose of oil soaked absorbent material and oil stained soil as needed. In the future the new standard operating procedure will be, immediately following a spill or leak absorbent material will be applied to contain the spill or leak. Once the absorbent material has served its purpose it will be placed in a tote and disposed of thru Safety-Kleen in a timely manner. Any petroleum spill greater than 50 gallons, or any release of oil if the oil reaches or threatens any waterway will be reported to the Missouri Department of Natural Resources at 573-634-2346 at the earliest practical moment upon discovery.

## **2. Not notifying the department of used oil collection.**

U-Pick-It, Inc. has notified Tom Judge with the Missouri Department of Natural Resources Hazardous Waste Program of their used oil collection activities according to 10 CSR 25-11.279. The letter informing the Missouri Department of Natural Resources Hazardous Waste Program was mailed on 2/21/12. See attachments for a copy of the letter sent.

U-Pick-It, Inc. contracts with Crystal Kleen to ship used oil off-site and take it to an oil refinery. Crystal Kleen has an Environmental Protection Agency generator identification number of ID# ILR000130062 to ship used oil off-site. In the future U-Pick-It, Inc. will follow the Used Oil Collection Center, Fact Sheet PUB136 when managing used oil collected from do-it-yourself users. See attachments for a copy of Used Oil Collection Center, Fact Sheet.

## **3. Make a hazardous waste determination on**

### **A) 5 unknown drums.**

Safety-Kleen has been contracted by U-Pick-It, Inc. to make a hazardous waste determination on the contents of the drums and then dispose of them accordingly and properly. Safety-Kleen is scheduled to pick up the waste on or before 2/24/12. U-Pick-It, Inc. is expecting the results of the hazardous waste determination within a week and once they are available U-Pick-It, Inc. will provide the EPA documentation regarding the determination of the contents with the specific waste names, an indication whether the



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waste is hazardous, non-hazardous, used oil, universal waste, or exempt from regulation. The documentation will include the analytical testing methods used and if applicable all RCRA waste codes. U-Pick-It, Inc. will also supply quantity or monthly generation rate of the waste at their facility, the length of time the waste has been generated at their facility, how long the waste has been stored at their facility, how the waste was handled at the facility, and how the waste was disposed of.

In the future U-Pick-It, Inc. will label all containers used for fluid storage so their contents is known. Waste fluid streams will be maintained separately. Used oil will not be mixed with hazardous waste, resulting in a hazardous waste mixture. In the future standard operating procedure will be to follow the Missouri Department of Natural Resources Used Oil Storage guidelines. See attachments for a copy of the Missouri Department of Natural Resources Used Oil Storage guidelines.

#### **B) 2, 5-gal pails of unknown (trash removed from cars)**

Safety-Kleen has been contracted by U-Pick-It, Inc. to make a hazardous waste determination on the contents of the pails and then dispose of them accordingly and properly. Safety-Kleen is scheduled to pick up the waste on or before 2/24/12. U-Pick-It, Inc. is expecting the results of the hazardous waste determination within a week. Once the results are available U-Pick-It, Inc. will provide the EPA with documentation regarding the determination of the contents with the specific waste names, an indication whether the waste is hazardous, non-hazardous, used oil, universal waste, or exempt from regulation. The documentation will include the analytical testing methods used and if applicable all RCRA waste codes. U-Pick-It, Inc. will also supply quantity or monthly generation rate of the waste at their facility, the length of time the waste has been generated at their facility, how long the waste has been stored at their facility, how the waste was handled at the facility, and how the waste was disposed of.

In the future vehicles being purchased will be thoroughly searched to eliminate accepting trash, hazardous waste, and items with unknown contents.

#### **C) Spent Lamps**

Spent lamps will be managed as universal waste according to Chapter 16 Missouri Hazardous Waste Management Regulations. The spent lamps that are currently accumulated at the facility are scheduled for pickup and recycling by Safety-Kleen on Friday 2/24/12. U-Pick-It, Inc. will provide the EPA with receipts for recycling once they become available.

In the future spent lamps will be stored in a closed container, package in way that prevents breaking and schedule for recycling as needed. When purchasing replacement fluorescent lamps, U-Pick-It, Inc. will start purchasing low-mercury "green end cap" fluorescent lamps. Broken spent lamps will be handled as hazardous waste and will



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contribute to the amount of hazardous waste generated at this facility, potentially changing their hazardous waste generator status. U-Pick-It, Inc. estimates that they will generate one to two spent lamps on an infrequent basis. Safety-Kleen will continue to pickup and recycle spent lamps as needed.

#### **D) Gasoline filters in containment**

The gasoline filters located in the secondary containment units on the day of the inspection 2/08/12 have been removed and drained of all fluids as of 2/21/12. The fluids were drained into the appropriate fluid storage tank and the gasoline filters were placed in a closed container to be managed as a hazardous waste. Safety-Kleen has been contracted to dispose of the old fuel filters.

In the future U-Pick-It, Inc. will manage all gasoline filters as hazardous waste. Safety-Kleen will supply U-Pick-It, Inc. with a 55 gallon drum to store old filters in. The new standard operating procedure will be to completely drain all fluids from the filters. Once the filters are drained and dried they will be stored in the closed 55 gallon drum. The container will be labeled "Old Fuel Filters". U-Pick-It, Inc. will then contact Safety-Kleen to dispose of the filters as needed. U-Pick-It, Inc. estimates that they will produce zero to one gasoline filter per month, which will be disposed of thru Safety-Kleen.

The vendor responsible for recycling a particular fluid also pumps out the fluids that may have accumulated in the secondary containment. Because the secondary containment units are located indoors rainwater isn't captured in the secondary containment units. Fluid captured in the secondary containment units is never released onto the earth nor is it disposed of in drains or storm sewers.

#### **E) Mercury Switches**

Mercury Switches will be managed as universal waste according to Chapter 16 Missouri Hazardous Waste Management Regulations. U-Pick-It, Inc. generates approximately 100 to 150 mercury switches a month. Mercury Switches will be scheduled for pick once every six months. U-Pick-It, Inc. will recycle Mercury Switches thru End of Live Vehicle Solutions (ELVS).

Mercury switches will be handled as described in 40 CFR 273.13(c)(3). A small quantity handler of universal waste mercury-containing equipment that does not contain an ampule may remove the open original housing holding the mercury from universal waste mercury-containing equipment provided the handler,

- Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment.
- Removes and managed the ampule in a manner designed to prevent breakage of the ampule.
- Remove the ampules only over or in a containment device.



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- Ensures that a mercury clean-up system is readily available to immediately transfer any mercury resulting from spills or leaks from broken ampules from that containment device that meets the requirements of 40 CFR 262.34.
- Immediately transfer any mercury resulting from spills or leaks from broken ampules from the containment device to a container that meets the requirements of 40 CFR 262.34.
- Ensures that the area in which ampules are removed is well ventilated and monitored to ensure compliance with applicable OSHA exposure levels of mercury.
- Ensure that employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers.
- Stores removed ampules in closed, non-leaking containers that are in good conditions.
- Packs removed ampules in the container with packing materials adequate to prevent breakage during storage, handling, and transportation.

#### Hazardous Waste and Universal Waste Determination

Spent Antifreeze is managed according to according to the Missouri Department of Natural Resources Antifreeze Waste Management Guide PUB000114. Antifreeze from various sources is bulked together as allowed by regulations. The bulked mixture of spent antifreeze is presumed to be nonhazardous as long as it is not mixed with other listed or characteristic waste. Therefore the volume of antifreeze generated at this facility doesn't contribute to their universal waste quantity handler status, or their hazardous waste generator status.

As of August 28, 1994 and according to 10 CSR 25-11.279 used oil is no longer considered a hazardous waste given that the used oil is recycled. Therefore the volume of used oil generated at this facility doesn't contribute to their universal waste quantity handler status, or their hazardous waste generator status.

Spent batteries are handled as a universal waste. In order to be managed as a universal waste the spent batteries must be sent to a recycling facility, a resource recovery facility or a permitted lead smelter. U-Pick-It, Inc. also manages their spent lamps and mercury switches as a universal waste as allowed in the universal waste rule in Missouri. In order to be managed as a universal waste spent lamps and mercury switches must be sent to another universal waste handler, to an authorized universal waste destination facility, or to a Missouri Certified Resource Recovery Facility. U-Pick-It, Inc. generates approximately 400 batteries per month. A portion of these batteries are useable batteries that are then resold to customers at this facility. Batteries that are not being resold are scheduled for weekly pickup. U-Pick-It, Inc. also generates one to two spent fluorescent lamps on an infrequent basis and approximately 100 - 150 mercury switches per month. The quantity of batteries, spent lamps, and mercury switches generated at U-Pick-It, Inc



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will contribute to their universal waste quantity handler status. U-Pick-It, Inc. accumulates less than 11,000 lbs of universal waste at their facility.

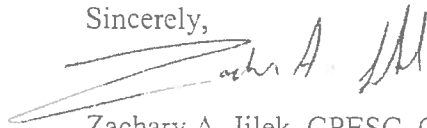
Sodium azide modules on select undeployed air bags are considered a hazardous waste. Fuel filters will also be managed as a hazardous waste. Therefore the quantity of sodium azide modules and gasoline dispenser fuel filters generated will contribute to U-Pick-It, Inc.'s hazardous waste generator status. Given the combination of sodium azide modules and fuel filters, U-Pick-It, Inc. does not generate more than 220lb per month combined. Given that this is the only hazardous waste generated at the facility, U-Pick-It, Inc. hazardous waste generator status is conditionally exempt small quantity generator.

Additionally U-Pick-It, Inc. has hired E&A Consulting Group, Inc. to apply for and secure a Missouri State Operating Permit for motor vehicle salvage yards and scrap metal recycling operations. This permit authorizes storm water discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System. As part of the permit process E&A Consulting Group, Inc. will develop and help implement a Storm Water Pollution Prevention Plan (SWPPP) that will identify Best Management Practices (BMPs) that will reduce the possibility of polluting storm water runoff. The permitting process will begin by 2/24/12. Also E&A Consulting Group, Inc. is going to prepare a Spill Prevention, Control and Countermeasure Plan (SPCC Plan), required for facilities with an above ground storage capacities of greater than 1,320 gallons of oil. The SPCC Plan will be available for review on site by the beginning of March. If requested, E&A Consulting Group, Inc. will provide you with copies of both the SWPPP and the SPCC.

Once the hazardous waste determinations are available (on the 5 unknown drums, and 2, 5-gal pails of unknown) E&A Consulting Group, Inc. will help U-Pick-It, Inc. in determining if their hazardous waste generator status needs to be modified. Currently Hazardous waste generated from this facility is managed as conditionally exempt small quantity generators. Less than 220 pounds per month of hazardous waste is generated at this facility. If at any time more than 220 pounds per month of hazardous waste is generated they will notify the EPA and obtain an EPA identification number and be considered a small or large quantity generator.

If you have any questions or need more information please feel free to contact by email at [zjilek@eacg.com](mailto:zjilek@eacg.com) or by telephone at 402-895-4700. U-Pick-It, Inc. and E&A Consulting Group appreciate the cooperation of the U.S. Environmental Protection Agency, Region VII in completing the above mention items.

Sincerely,



Zachary A. Jilek, CPESC, CISEC  
Manager of Environmental Compliance



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CC: Adam Moran  
Bill Baber  
Nick Tordoff  
Caleb Snyder

Attachments (4): Used Oil Cleanup Checklist, PUB002115  
Letter to the Missouri DNR Hazardous Waste Program  
Used Oil Collection Center, Fact Sheet  
Missouri DNR Used Oil Storage guidelines



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## Used Oil Cleanup Checklist

Hazardous Waste Program fact sheet

6/2006

1. Respond in writing to the Missouri Department of Natural Resources' Notice of Violation with description of corrective actions you will take and a schedule of activity for cleanup. See below for the potential actions that will help you write a response.
2. Excavate all visibly contaminated soil and debris (the waste).
3. Determine if free liquids are present in the waste by using Method 9095 from *Publication SW-846* of the U.S. Environmental Protection Agency (EPA). Note: If a minimal amount of free liquids are present, a non-hazardous absorbent may be added to the excavated waste.
4. Any recovered liquid oil should be containerized and managed in compliance with the applicable requirements for used oil in Chapter 11 of the *Missouri Hazardous Waste Management Regulations* and the referenced 40 CFR Part 279 regulations. Also the *Management Standards for Used Oil Generators* technical bulletin (PUB131).
5. Place all non-liquid waste in covered containers, on tarps or heavy-gauge plastic and cover well to minimize human contact and further loss to the environment.
6. Estimate the total quantity of waste to be disposed.
  - A. If the waste is less than five cubic yards and does not contain any free liquid or any other hazardous waste
    - Send the waste to a permitted sanitary landfill after completing and submitting the *Special Waste Disposal Request* form (MO 780 -1166) as directed on the form.
    - No further action or submittals are required.
  - B. If the waste is more than five cubic yards
7. Determine if the waste contains free liquid. Note: If the waste contains free liquid, you must have a laboratory conduct a flashpoint analysis. If the waste does not contain free liquid, a flashpoint analysis is not necessary. See #3 above for the test method.
8. Collect and have laboratory analyses conducted on representative samples of the waste according to sample collection, preservation, handling and analysis procedures for the Toxicity Characteristic Leaching Procedure (TCLP) found in Appendix II of 40 CFR Part 261. The purpose of the sampling is to determine if the waste exceeds the regulatory maximum concentrations of the following eight toxic "heavy" metals:

Arsenic	5.0 mg/l	Lead	5.0 mg/l
Barium	100.0 mg/l	Mercury	0.2 mg/l
Cadmium	1.0 mg/l	Selenium	1.0 mg/l
Chromium	5.0 mg/l	Silver	5.0 mg/l





9. Also collect and have laboratory analyses conducted on representative samples of the waste according to a Total Volatile Organics Analysis (Total VOA). The sampling should be conducted according to the sampling collection, preservation, handling and analysis procedures for Total VOA found in EPA test method 8240 or 8260 in SW-846. The purpose of this sampling is to determine if the waste was mixed with solvents, which would cause the waste to be hazardous.
10. If any one of the regulatory limits identified in B. #2 is exceeded, or the waste has a flashpoint of less than 60 degrees Celsius (140 degrees Fahrenheit), the waste is hazardous and you must do the following:
  - A. Register as a hazardous waste generator using the *Notification of Regulated Waste Activity* form (PUB 2065/MO 780 - 1164).
  - B. Send all laboratory analyses reports and any documentation concerning the waste to the Missouri Department of Natural Resources, Hazardous Waste Enforcement Unit, P.O. Box 176, Jefferson City, MO 65102-0176, and wait for further instructions from the Unit prior to disposal. Include a cover note stating that you have found this used oil-contaminated material to be hazardous and you are awaiting instruction from the department.
  - C. Note: If the waste is hazardous, you will be required to use a licensed hazardous waste transporter and manifest system for shipment of the waste to a permitted or interim status hazardous waste disposal facility.
11. If laboratory analyses show that no regulatory limit is exceeded, the waste does not contain solvents, other hazardous waste, free liquids and is not ignitable, you may dispose of it at a permitted sanitary landfill after you
  - A. Complete and submit the *Special Waste Disposal Request* form as directed on the form, and
  - B. Submit a copy of your fully signed *Special Waste Disposal Request* to the Hazardous Waste Program's Hazardous Waste Enforcement Unit, which includes the landfill representative's signature.

**Note:** If you generate in one month, or accumulate at any one time, one hundred kilograms (approximately 220 pounds or 1/2 of a 55-gallon barrel) or more of hazardous waste, you must register as a hazardous waste generator with the Department of Natural Resources. See the *Notification of Regulated Waste Activity* (PUB 2065/MO 780 - 1164). This form must also be updated any time the reported information changes.

**For more information call or write:**

Missouri Department of Natural Resources  
Hazardous Waste Program  
P.O. Box 176  
Jefferson City, MO 65102-0176  
1-800-361-4827 or (573) 751-3176  
Fax (573) 751-7869  
[www.dnr.mo.gov/env/hwp](http://www.dnr.mo.gov/env/hwp) Program Home Page

If you are using a Telecommunications Device for the Deaf (TDD), please call Relay Missouri at 1-800-735-2966.



*Engineering Answers*  
**E & A CONSULTING GROUP, INC.**

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330 NORTH 117TH STREET  
OMAHA, NE 68154-2509

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PHONE: 402.895.4700  
FAX: 402.895.3599

February 21, 2012

Tom Judge  
Missouri Department of Natural Resources  
Hazardous Waste Program  
P.O. Box 176  
Jefferson City, MO 65102

RE: Letter informing of used oil collection activities  
U-Pick-It, Inc.  
7700 E. Winner Rd  
Kansas City, MO 64125

E&A #P2011.085.001

Dear Mr. Judge

This letter is to inform you of the used oil collection activities conducted at U-Pick-It, Inc. U-Pick-It, Inc. located at 7700 E. Winner Rd, Kansas City, MO 64125 is an automobile salvage yard and scrap recycling facility with SIC codes of 5015 and 5093. The facility owner/operator is Harry Hansen and the telephone number he can be reached at is 402-991-8180. The facility contact is Adam Moran, General Manager of U-Pick-It, Inc. and the telephone number he can be reached at is 913-207-7879.

This facility only takes in used oil that has been discarded by customers in the parking lot. This facility operates seven days a week 8:00 am till dark in the winter months and 8:00 am till 6:00 pm during the summer months.

This facility is classified as a do-it-yourselfer used oil collection center. Do-it-yourselfer used oil collection center means any site or facility that accepts/aggregates and stores used oil collected only from household do-it-yourselfers and the definition has been amended to include oil collected from household do-it-yourselfers and farmers not regulated by 40 CFR part 279 subpart C. U-Pick-It, Inc. contracts Crystal Kleen, EPA ID# ILR000130062 to transport used oil to a refinery. If you have any question or need any additional information please feel free to contact me.

Thank You,

  
Zachary A. Jilek, CPESC, CISEC  
Manager of Environmental Compliance



## Used Oil Collection Centers

Hazardous Waste Program technical bulletin

6/2006

### Used Oil

Used oil is defined as petroleum-derived and synthetic oils spilled into the environment or used for lubrication or cutting oil, heat transfer, hydraulic power or insulation in dielectric transformers. Oils used as solvents and used ethylene glycol are not defined as used oil.

It is estimated that more than 200 million gallons of used motor oil are improperly disposed each year in the U.S. by citizens who change their own oil. Unfortunately, most do-it-yourself used oil is dumped on the ground, poured down storm drains or placed in the trash. These actions cause needless damage to ground and surface water and waste a valuable renewable resource, making us more dependent on foreign imports of oil.

The Missouri Department of Natural Resources encourages used oil generators and local governments to establish used oil recycling programs. Used oil recycling programs protect the environment and save money. This technical bulletin describes the management standards for used oil collection centers and aggregation points under 10 CSR 25-11.279, which became effective on Aug. 28, 1994.

### Collection Centers and Aggregation Points

Three types of used oil collection programs are allowed by the regulation. All used oil collection programs must comply with the management standards for used oil generators.

Do-it-yourself used oil collection centers may accept, aggregate and store used oil only from household do-it-yourself users and farmers who are exempt from the generator requirements. Exempted farmers produce no more than 25 gallons of used oil per month from farm vehicles and machinery in a calendar year.

Used oil collection centers may accept shipments of no more than 55 gallons at a time from regulated used oil generators. Used oil collection centers must be registered, licensed, permitted or recognized by a state, county or municipal government. The notification submitted to the Department of Natural Resources by a used oil collection center will satisfy the requirement that the used oil collection center be recognized by the state. Check locally to find out if there are any additional requirements.

A used oil aggregation point accepts, gathers or stores used oil collected only from used oil generation sites under common ownership in shipments of no more than 55 gallons. Used oil collection centers and used oil aggregation points may also accept used oil from household do-it-yourself users and exempt farmers.

### Management Standards

All types of used oil collection sites or facilities must comply with the following standards:

- Have an attendant present when the public has access to the site;
- Notify the Department of their used oil activities;



- Have a means to control public access to unattended used oil storage areas;
- Keep storage tanks and containers in good condition and labeled "used oil";
- Keep tanks and containers that are exposed to rainfall closed except when adding or removing used oil;
- Limit storage to no more than 12 months before shipping off site;
- Clean up any used oil spills or leaks to the environment; and
- Use a transporter with a *Missouri Hazardous Waste Transporter License* and an Environmental Protection Agency generator identification number to ship used oil off-site.

### **Additional Information**

Related technical bulletins and inspection checklists can be obtained by contacting the Department of Natural Resources:

- *Used Oil Generators* (pub131)
- *Used Oil Contaminated Waste* (pub153)
- *Used Oil Burners* (pub134)
- *Used Oil Transporters* (pub132)
- *Used Oil Processors and Re-refiners* (pub154)
- *Used Oil Marketers* (pub133)

### **For more information call or write:**

Missouri Department of Natural Resources  
Hazardous Waste Program  
P.O. Box 176, Jefferson City, MO 65102-0176  
1-800-361-4827 or (573) 751-3176 office  
(573) 751-7869 fax  
[www.dnr.mo.gov/env/hwp](http://www.dnr.mo.gov/env/hwp) Program Home Page

If you are using a Telecommunications Device for the Deaf (TDD), please call Relay Missouri at 1-800-735-2966.



Missouri Department of Natural Resources  
"Integrity and excellence in all we do"

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## Used Oil Storage

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Improper storage of used oil can increase the risk of spills and leaks that could harm the environment. Spills can also be expensive to clean up. In Missouri, there are some legal requirements for storing used oil from your business.

If you store used oil, you must:

- Label or mark the storage container(s) with the words "Used Oil."
- Keep containers in good condition.
- Not store used oil collected from do-it-yourselfers longer than 12 months.
- Keep containers closed if they are exposed to rain or snow (except when removing or adding used oil).
- Inspect storage areas regularly for leaks or spills. Clean up spills and leaks.
- Fix leaking containers immediately or move the oil to another container.

Although you aren't required to, you may wish to put used oil containers in a secondary containment structure to prevent spills and contamination.

Secondary containment is a structure or container that surrounds the storage tank and can catch the liquid if the storage tank leaks. The secondary containment should have a volume at least 10 percent greater than the volume of the largest container.

If you are storing a large amount of petroleum products in an aboveground tank (or a total of over 1,320 gallons) you **are required** to have spill prevention measures. See the *Petroleum Storage Tanks* guide sheet for more information.

Your community or county may have specific requirements for storing oil. Check with local authorities, particularly your fire department.

The Missouri Department of Natural Resources recommends not storing used oil in underground tanks.

Storing containers on an impervious surface, like sealed or treated concrete, helps contain spills and makes cleanup easier. Some businesses store their used oil containers on pallets or slightly elevated in some way to make it easier to spot spills or leaks. Clean up all spills immediately. Spills of more than 25 gallons of used oil or other petroleum products from underground storage tanks must be reported to the department. Petroleum spills from any other source must be reported if the spill is more than 50 gallons. However, if the petroleum spills into a waterway such as a creek, lake, river or stream, or into a ditch that drains to a waterway, it must be reported to the department no matter how small the spill.

NOTE: The legal requirements for used oil storage can be found in the *Missouri Code of State Regulations*, 10 CSR 25, Chapter 11 and in the *Code of Federal Regulations*, 40 CFR Part 279.

**Remember**

- Label or mark storage containers and keep them in good condition.
- Inspect storage areas regularly. Fix leaks immediately or move the oil to another container.
- If containers are exposed to rain, keep them closed except when adding or removing used oil.
- Check with local authorities to learn if there are local requirements.
- Oil spills must be reported to the department by calling (573) 634-2436.

**Pollution Prevention Options**

Preventing pollution instead of treating or disposing of it can save money, protect the environment and reduce risk to people. Here are some suggestions:

- ✓ Keep used oil separate from other wastes.
- ✓ Have separate storage containers for antifreeze, solvents or other fluids that could accidentally be mixed with used oil.
- ✓ Use large drum funnels or fill tubes when filling used oil drums. Store funnels on a drip pan to collect dripping oil.
- ✓ Clean spills on a floor with a rag or mop that can be wrung-out and reused. A biodegradable soap and water solution may be used to clean up oil sheens.

**For More Information**

Missouri Department of Natural Resources  
Environmental Assistance Office  
P.O. Box 176  
Jefferson City, MO 65102-0176  
1-800-361-4827 or (573) 526-6627  
[www.dnr.mo.gov/oac/env\\_assistance.htm](http://www.dnr.mo.gov/oac/env_assistance.htm)